

NB:CNC
F.#2010R00652

RECEIVED
U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
OCT 13 2010

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

ANGEL CORDERO, JR.,
also known as "King Epic,"
"Epic" and "Ep,"
JOSE SOSA,
also known as "King Sosa"
and "Sosa,"
LUIS LEMUS,
also known as "King Scar"
and "Scar,"
EDWIN MOREJON,
also known as "King Drama,"
"Drama" and "E-Money,"
LUIS G. HERNANDEZ,
also known as "King Infinite"
and "Infinite,"
WILLIAM RODRIGUEZ,
also known as "King Villain"
and "Villain,"
MICHAEL DIAZ,
also known as "King Popeye,"
"Popeye" and "P-Eye,"
JOSE CANDELARIO,
also known as "King Dice"
and "Dice,"
RUDDY VASQUEZ,
also known as "King Estrella,"
"Estrella" and "Star,"
ROBERT WILLIAMS,
also known as "King Illis"
and "Illis,"
EDWIN RIVERA, JR.
also known as "King Bunny"
and "Bunny,"
LUIS J. HERNANDEZ, JR.
also known as "King Justice"
and "Justice," and
SCAL MAZARA,
also known as "King Puppet,"
"Puppet" and "Pup,"

Defendants.

X
S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 10-281(S-3)(SJF)
(T. 18, U.S.C., §§ 371,
922(a)(1)(A), 922(g)(1),
922(k), 924(a)(1)(B),
924(a)(1)(D), 924(a)(2),
924(c)(1)(A)(i),
924(c)(1)(A)(ii),
924(c)(1)(A)(iii),
1951(a), 1959(a)(3),
1959(a)(4), 1959(a)(5),
1959(a)(6), 2, 3 and
3551 et seq.; T. 21,
U.S.C., §§ 841(a)(1),
841(b)(1)(A)(iii),
841(b)(1)(C) and 846)

THE GRAND JURY CHARGES:

INTRODUCTION TO ALL COUNTS

At all times relevant to this Superseding Indictment, unless otherwise indicated:

1. The Almighty Latin King and Queen Nation street gang (hereinafter the "Latin Kings") was a Chicago-based violent street gang comprised of mainly Spanish speaking or Hispanic members, with members located throughout Long Island and elsewhere, divided into local chapters or "divisions." The defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," LUIS LEMUS, also known as "King Scar" and "Scar," EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," LUIS G. HERNANDEZ, also known as "King Infinite" and "Infinite," WILLIAM RODRIGUEZ, also known as "King Villain" and "Villain," MICHAEL DIAZ, also known as "King Popeye," "Popeye" and "P-Eye," JOSE CANDELARIO, also known as "King Dice" and "Dice," RUDDY VASQUEZ, also known as "King Estrella," "Estrella" and "Star," ROBERT WILLIAMS, also known as "King Illis" and "Illis," EDWIN RIVERA, JR., also known as "King Bunny" and "Bunny," LUIS J. HERNANDEZ, JR., also known as "King Justice" and "Justice," and SCAL MAZARA, also known as "King Puppet," "Puppet" and "Pup," were members of the Latin Kings. MOREJON became a Latin King in or about and between late 2008 and early 2009. The leaders of the Huntington division of the Latin Kings terminated RIVERA's membership in or about August 2009. The Southside Posse, also known as the "SSP," the Crips,

the Zulu Nation and La Mara Salvatrucha, also known as the "MS-13," were rival street gangs of the Latin Kings and had members located throughout Long Island.

2. The Latin Kings routinely held meetings to, among other things, plan criminal activity. At meetings, members paid dues into a treasury. The treasury funds were used, among other things, to purchase firearms and ammunition and to assist members who had been arrested. Members of the Latin Kings sometimes signified their membership and allegiance to the gang by wearing the colors black, gold and red, wearing beads, using the phrase "Amor del Rey" and "A.D.R.," which means love of the king, displaying special hand signals and salutes, and wearing tattoos depicting a five-pointed crown and reading, among other things, "ALKQN" and "A.D.R."

3. Members of the Latin Kings engaged in criminal activity, such as robbery, assault, arson and narcotics trafficking. Participation in criminal activity by a member, especially violence directed at rival gangs, increased the respect accorded to that member and could result in a promotion to a leadership position. Members of the Latin Kings purchased, maintained and circulated a collection of firearms for use in criminal activity.

THE RACKETEERING ENTERPRISE

4. The Latin Kings, including its leadership, membership and associates, constituted an "enterprise" as defined

in Section 1959(b)(2) of Title 18, United States Code, that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

5. The Latin Kings, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts and threats involving robbery and arson, in violation of the laws of the State of New York, robbery, in violation of Title 18, United States Code, Section 1951(a), and narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

COUNT ONE
(Conspiracy to Commit Assault
with Dangerous Weapons)

6. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

7. In or about and between February 2008 and March 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," LUIS LEMUS, also known as "King Scar" and "Scar," EDWIN MOREJON, also known as

"King Drama," "Drama" and "E-Money," LUIS G. HERNANDEZ, also known as "King Infinite" and "Infinite," WILLIAM RODRIGUEZ, also known as "King Villain" and "Villain," MICHAEL DIAZ, also known as "King Popeye," "Popeye" and "P-Eye," RUDDY VASQUEZ, also known as "King Estrella," "Estrella" and "Star," and ROBERT WILLIAMS, also known as "King Illis" and "Illis," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally conspire to assault members and associates of rival gangs, including the SSP, Crips, and others, and individuals who disrespected members of the Latin Kings, with dangerous weapons, including, but not limited to, firearms, in violation of New York Penal Law Sections 120.05(2) and 105.05.

(Title 18, United States Code, Sections 1959(a)(6) and 3551 et seq.)

COUNT TWO
(Hobbs Act Robbery Conspiracy)

8. On or about November 30, 2008, within the Eastern District of New York, the defendants EDWIN RIVERA, JR., also known as "King Bunny" and "Bunny," LUIS J. HERNANDEZ, JR., also known as "King Justice" and "Justice," and SCAL MAZARA, also known as "King Puppet," "Puppet" and "Pup," together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by robbery, to wit: robbery of John Doe No. 1, a

narcotics distributor, in Kings Park, New York, whose identity is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT THREE
(Attempted Hobbs Act Robbery)

9. On or about November 30, 2008, within the Eastern District of New York, the defendants EDWIN RIVERA, JR., also known as "King Bunny" and "Bunny," LUIS J. HERNANDEZ, JR., also known as "King Justice" and "Justice," and SCAL MAZARA, also known as "King Puppet," "Puppet" and "Pup," together with others, did knowingly and intentionally attempt to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by robbery, to wit: robbery of John Doe No. 1, a narcotics distributor, in Kings Park, New York, whose identity is known to the Grand Jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT FOUR
(Brandishing of a Firearm During a Crime of Violence)

10. On or about November 30, 2008, within the Eastern District of New York, the defendants EDWIN RIVERA, JR., also known as "King Bunny" and "Bunny," LUIS J. HERNANDEZ, JR., also known as "King Justice" and "Justice," and SCAL MAZARA, also known as "King Puppet," "Puppet" and "Pup," together with others, did knowingly and intentionally use and carry a firearm during

7
and in relation to crimes of violence, to wit: the crimes charged in Counts Two and Three, and did knowingly and intentionally possess that firearm in furtherance of said crimes of violence, which firearm was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

COUNT FIVE
(Assault with a Dangerous Weapon:
Shooting of John Doe No. 2)

11. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

12. On or about February 20, 2009, within the Eastern District of New York, the defendants JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally assault John Doe No. 2, an individual whose identity is known to the Grand Jury, whom the defendants believed to be a member of the Crips, with a dangerous weapon, to wit: a firearm, in violation of New York Penal Law Section 120.05(2).

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT SIX

(Discharge of a Firearm During a Crime of Violence: Shooting of John Doe No. 2)

13. On or about February 20, 2009, within the Eastern District of New York, the defendants JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Five, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT SEVEN

(Accessory After the Fact)

14. On or about and between February 20, 2009 and February 27, 2009, both dates being approximate and inclusive, within the Eastern District of New York, the defendant ROBERT WILLIAMS, also known as "King Illis" and "Illis," knowing that an offense against the United States had been committed, to wit: the offenses charged in Counts Five and Six, did knowingly and intentionally receive and assist John Doe No. 3, whose identity is known to the Grand Jury, in order to hinder and prevent John Doe No. 3's apprehension, trial and punishment.

(Title 18, United States Code, Sections 3 and 3551 et seq.)

COUNT EIGHT
(Threatening to Commit Crimes of Violence)

15. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

16. On or about March 5, 2009, within the Eastern District of New York, the defendants MICHAEL DIAZ, also known as "King Popeye," "Popeye" and "P-Eye," and LUIS LEMUS, also known as "King Scar" and "Scar," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally threaten to commit crimes of violence, in violation of New York Penal Law Section 120.15, against one or more individuals, to wit: John Doe Nos. 4 and 5 and Jane Doe Nos. 6 and 7, individuals whose identities are known to the Grand Jury.

(Title 18, United States Code, Sections 1959(a)(4), 2 and 3551 et seq.)

COUNT NINE
(Discharge of a Firearm During Crimes of Violence)

17. On or about March 5, 2009, within the Eastern District of New York, the defendants MICHAEL DIAZ, also known as "King Popeye," "Popeye" and "P-Eye," and LUIS LEMUS, also known as "King Scar" and "Scar," together with others, did knowingly and intentionally use and carry a firearm during and in relation to crimes of violence, to wit: the crimes charged in Counts One

and Eight, and did knowingly and intentionally possess that firearm in furtherance of said crimes of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT TEN
(Possession of a Firearm During a Crime of Violence:
Conspiracy to Commit Assault with a Dangerous Weapon)

18. On or about March 5, 2009, within the Eastern District of New York, the defendant ROBERT WILLIAMS, also known as "King Illis" and "Illis," together with others, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count One, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 2 and 3551 et seq.)

COUNT ELEVEN
(Assault with Dangerous Weapons:
Shooting of John Doe No. 8)

19. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

20. On or about July 30, 2009, within the Eastern District of New York, the defendants JOSE SOSA, also known as "King Sosa" and "Sosa," and LUIS LEMUS, also known as "King Scar" and "Scar," together with others, for the purpose of maintaining

and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally assault John Doe No. 8, an individual whose identity is known to the Grand Jury, whom the defendants believed to be an SSP member, with dangerous weapons, to wit: a 9mm Hi Point carbine and another firearm, in violation of New York Penal Law Section 120.05(2).

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT TWELVE
(Discharge of a Firearm During a Crime of Violence: Shooting of John Doe No. 8)

21. On or about July 30, 2009, within the Eastern District of New York, the defendants JOSE SOSA, also known as "King Sosa" and "Sosa," and LUIS LEMUS, also known as "King Scar" and "Scar," together with others, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Eleven, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT THIRTEEN

(Attempted Assault with a Dangerous Weapon:
Attempted Shooting of John Does Nos. 9, 10 and 11)

22. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

23. On or about August 6, 2009, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and WILLIAM RODRIGUEZ, also known as "King Villain" and "Villain," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally attempt to assault John Doe Nos. 9, 10 and 11, individuals whose identities are known to the Grand Jury, who the defendants believed to be members of the Crips, with a dangerous weapon, to wit: a 9mm Hi Point carbine, in violation of New York Penal Law Sections 110 and 120.05(2).

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT FOURTEEN

(Discharge of a Firearm During a Crime of Violence:
Attempted Shooting of John Doe Nos. 9, 10 and 11)

24. On or about August 6, 2009, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and WILLIAM RODRIGUEZ, also known as

"King Villain" and "Villain," together with others, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Thirteen, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT FIFTEEN
(Assault with a Dangerous Weapon:
Shooting of John Doe No. 12)

25. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

26. On or about September 1, 2009, within the Eastern District of New York, the defendant LUIS LEMUS, also known as "King Scar" and "Scar," for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally assault John Doe No. 12, an individual whose identity is known to the Grand Jury, who the defendant believed to be an SSP member, with a dangerous weapon, to wit: a .357 Ruger revolver, in violation of New York Penal Law Section 120.05(2).

(Title 18, United States Code, Sections 1959(a)(3) and 3551 et seq.)

COUNT SIXTEEN

(Discharge of a Firearm During a Crime of Violence: Shooting of John Doe No. 12)

27. On or about September 1, 2009, within the Eastern District of New York, the defendant LUIS LEMUS, also known as "King Scar" and "Scar," did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Fifteen, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii) and 3551 et seq.)

COUNT SEVENTEEN

(Accessory After the Fact)

28. On or about and between September 1, 2009 and September 17, 2009, both dates being approximate and inclusive, within the Eastern District of New York, the defendant ROBERT WILLIAMS, also known as "King Illis" and "Illis," knowing that an offense against the United States had been committed, to wit: the offenses charged in Counts Fifteen and Sixteen, did knowingly and intentionally receive and assist Luis Lemus in order to hinder and prevent Lemus's apprehension, trial and punishment.

(Title 18, United States Code, Sections 3 and 3551 et seq.)

COUNT EIGHTEEN
(Conspiracy to Commit Murder)

29. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

30. On or about September 13, 2009, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," WILLIAM RODRIGUEZ, also known as "King Villain" and "Villain," LUIS G. HERNANDEZ, also known as "King Infinite" and "Infinite," JOSE CANDELARIO, also known as "King Dice" and "Dice," and RUDDY VASQUEZ, also known as "King Estrella," "Estrella" and "Star," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally conspire to murder members of the Crips, in violation of New York Penal Law Sections 125.25 and 105.15.

(Title 18, United States Code, Sections 1959(a)(5) and 3551 et seq.)

COUNT NINETEEN
(Possession of a Firearm During a Crime
of Violence: Conspiracy to Murder Crips)

31. On or about September 13, 2009, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," WILLIAM RODRIGUEZ, also known as "King

"Villain" and "Villain," LUIS G. HERNANDEZ, also known as "King Infinite" and "Infinite," JOSE CANDELARIO, also known as "King Dice" and "Dice," and RUDDY VASQUEZ, also known as "King Estrella," "Estrella" and "Star," together with others, did knowingly and intentionally use and carry firearms during and in relation to a crime of violence, to wit: the crime charged in Count Eighteen, and did knowingly and intentionally possess firearms in furtherance of said crime of violence.

(Title 18, United States Code, Sections 924 (c) (1) (A) (i), 2 and 3551 et seq.)

COUNT TWENTY
(Felon In Possession of a Firearm)

32. On or about and between September 13, 2009 and September 20, 2009, both dates being approximate and inclusive, within the Eastern District of New York, the defendant JOSE CANDELARIO, also known as "King Dice" and "Dice," having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a 9mm Smith & Wesson semi-automatic pistol.

(Title 18, United States Code, Sections 922(g) (1), 924(a) (2) and 3551 et seq.)

COUNT TWENTY-ONE
(Possession of a Defaced Firearm)

33. On or about October 1, 2009, within the Eastern District of New York, the defendant ANGEL CORDERO, JR., also

known as "King Epic," "Epic" and "Ep," did knowingly and intentionally possess a firearm, to wit: a .380 caliber Bersa Thunder semi-automatic pistol, which firearm had the manufacturer's serial number removed, obliterated, and altered, and which had been shipped and transported in interstate commerce.

(Title 18, United States Code, Sections 922(k), 924(a)(1)(B) and 3551 et seq.)

COUNT TWENTY-TWO
(Attempted Assault with a Dangerous Weapon:
Attempted Shooting of Crips)

34. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

35. On or about October 17, 2009, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally attempt to assault individuals whom the defendants believed to be members of the Crips, with a dangerous weapon, to wit: a 9mm Smith & Wesson semi-automatic

pistol, in violation of New York Penal Law Sections 110 and 120.05(2).

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT TWENTY-THREE

(Discharge of a Firearm During a Crime of Violence:
Attempted Shooting of Crips)

36. On or about October 17, 2009, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Twenty-Two, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT TWENTY-FOUR

(Assault with a Dangerous Weapon:
Shooting of John Doe No. 13)

37. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

38. On or about October 18, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as

"King Drama," "Drama" and "E-Money," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally assault John Doe No. 13, an individual whose identity is known to the Grand Jury, whom the defendant believed to be a rival gang member, with dangerous weapons, to wit: a 9mm Smith & Wesson semi-automatic pistol and another firearm, in violation of New York Penal Law Section 120.05 (2).

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT TWENTY-FIVE

(Attempted Assault with a Dangerous Weapon:
Attempted Shooting of John Doe No. 14)

39. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

40. On or about October 18, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally attempt to assault John Doe No. 14, an individual whose identity is known to the Grand Jury, whom the defendant believed to be a rival gang member, with dangerous weapons, to wit: a 9mm Smith & Wesson semi-automatic pistol and

another firearm, in violation of New York Penal Law Sections 110 and 120.05(2).

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT TWENTY-SIX
(Discharge of a Firearm During a Crime of
Violence: Shooting of John Doe No. 13 and
Attempted Shooting of John Doe No. 14)

41. On or about October 18, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, did knowingly and intentionally use and carry a firearm during and in relation to crimes of violence, to wit: the crimes charged in Counts Twenty-Four and Twenty-Five, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT TWENTY-SEVEN
(Possession of a Defaced Firearm)

42. On or about December 10, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," did knowingly and intentionally possess a firearm, to wit: a 9mm Smith & Wesson semi-automatic pistol, which firearm had the manufacturer's

serial number removed, obliterated, and altered, and which had been shipped and transported in interstate commerce.

(Title 18, United States Code, Sections 922(k), 924(a)(1)(B) and 3551 et seq.)

COUNT TWENTY-EIGHT

(Attempted Assault with a Dangerous Weapon:
Attempted Shooting of John Doe No. 15)

43. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

44. On or about December 31, 2009, within the Eastern District of New York, the defendants JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally attempt to assault John Doe No. 15, an individual whose identity is known to the Grand Jury, whom the defendants believed to be a member of the Crips, with a dangerous weapon, to wit: a firearm, in violation of New York Penal Law Sections 110 and 120.05(2).

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT TWENTY-NINE

(Discharge of a Firearm During a Crime of Violence: Attempted Shooting of John Doe No. 15)

45. On or about December 31, 2009, within the Eastern District of New York, the defendants JOSE SOSA, also known as

"King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Twenty-Eight, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT THIRTY

(Attempted Assault with a Dangerous Weapon:
Attempted Shooting of Crips)

46. The allegations contained in paragraphs one through five are realleged and incorporated by reference as if fully set forth in this paragraph.

47. On or about March 11, 2010, within the Eastern District of New York, the defendant ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," and LUIS G. HERNANDEZ, also known as "King Infinite" and "Infinite," for the purpose of maintaining and increasing position in the Latin Kings, an enterprise that was engaged in racketeering activity, did knowingly and intentionally attempt to assault individuals whom the defendants believed to be members of the Crips, with a

dangerous weapon, to wit: a 9mm Hi Point semi-automatic pistol, in violation of New York Penal Law Sections 110 and 120.05(2).

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT THIRTY-ONE

(Discharging a Firearm During a Crime of Violence: Attempted Shooting of Crips)

48. On or about March 11, 2010, within the Eastern District of New York, the defendant ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," and LUIS G. HERNANDEZ, also known as "King Infinite" and "Infinite," did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count Thirty, and did knowingly and intentionally possess that firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT THIRTY-TWO

(Conspiracy to Deal in Firearms)

49. On or about and between September 9, 2009 and March 25, 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," not being

licensed importers, licensed manufacturers, licensed dealers or licensed collectors of firearms, together with others, did knowingly and willfully conspire to engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

50. In furtherance of the conspiracy and to effect its objectives, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. On or about September 9, 2009, in Huntington Station, New York, defendant ANGEL CORDERO, JR., in exchange for a sum of United States currency, sold two firearms to John Doe No. 16, whose identity is known to the Grand Jury.

b. On or about September 14, 2009, defendant ANGEL CORDERO, JR. had telephone conversations with John Doe No. 16, during which CORDERO agreed to sell John Doe No. 16 a firearm.

c. On or about September 14, 2009, defendant ANGEL CORDERO, JR. told John Doe No. 16 to pick up defendant JOSE SOSA.

d. On or about September 14, 2009, in Huntington

Station, New York, defendant JOSE SOSA provided a 9mm Hi Point carbine and ammunition to John Doe No. 16 in exchange for a sum of United States currency.

e. On or about October 1, 2009, in Deer Park, New York, defendant ANGEL CORDERO, JR. sold John Doe No. 16 a firearm in exchange for a sum of United States currency.

f. On or about December 10, 2009, in Deer Park, New York, defendant EDWIN MOREJON sold John Doe No. 16 a firearm in exchange for a sum of United States currency.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT THIRTY-THREE
(Illegal Dealing in Firearms)

51. On or about and between September 9, 2009 and March 25, 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendants ANGEL CORDERO, JR., also known as "King Epic," "Epic" and "Ep," JOSE SOSA, also known as "King Sosa" and "Sosa," and EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, not being licensed importers, licensed manufacturers or licensed dealers in firearms, together with others, did knowingly and willfully engage in the business of dealing in firearms.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551 et seq.)

COUNT THIRTY-FOUR

(Conspiracy to Distribute and Possess
with Intent to Distribute Cocaine Base)

52. On or about and between November 4, 2009 and January 26, 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing 50 grams or more of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-FIVE

(Cocaine Base Distribution)

53. On or about November 4, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-SIX
(Cocaine Base Distribution)

54. On or about November 10, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-SEVEN
(Cocaine Base Distribution)

55. On or about December 4, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-EIGHT
(Cocaine Base Distribution)

56. On or about January 26, 2010, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," did knowingly and

intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT THIRTY-NINE

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin)

57. On or about December 11, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT FORTY

(Distribution and Possession With Intent to Distribute Heroin)

58. On or about December 11, 2009, within the Eastern District of New York, the defendant EDWIN MOREJON, also known as "King Drama," "Drama" and "E-Money," together with others, did knowingly and intentionally distribute and possess with intent to

29

distribute a controlled substance, which offense involved a substance containing heroin, a Schedule I controlled substance.

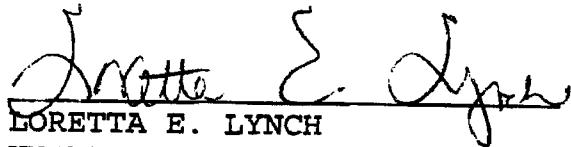
(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

A TRUE BILL



ROBERT J. McCALL

FOREPERSON


LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. #2010R00652

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

51

ANGEL CORDERO, JR. / 11

Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 371, 922 (a) (1) (A), 922(g) (1), 922 (k), 924 (a) (1) (B), 924 (a) (1) (D), 924 (a) (2), 924 (c) (1) (A) (i), 924 (c) (1) (A) (ii), 924 (c) (1) (A) (iii), 1951 (a), 1959 (a) (3), 1959 (a) (4), 1959 (a) (5), 1959 (a) (6), 2, 3 and 3551 et seq.; T. 21, U.S.C., §§ 841 (a) (1), 841(b) (1) (A) (iii), 841(b) (1) (C) and 846.

A true bill.

A true bill.
F. W. Miller
Foreman

Filed in open court this _____ day of _____,

of —————— A.D. 19 ——————

Bail, \$ _____

CARRIE CAPWELL, (631) 715-7836